

EXHIBIT S

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re Terrorist Attacks on September 11, 2001 | 03-md-1570 (GBD)(SN) ECF Case |
| This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i> | 15-cv-9903 (GBD) (SN) ECF Case |

DECLARATION OF ANTONIO QUINONES

I, Antonio Quinones, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the World Trade Center Towers when the terrorist attacks occurred.

4. At the time of the September 11th terrorist attacks, I was working for ABM Industries in the North Tower of the World Trade Center where my brother, mother, and stepfather also worked.

5. I typically worked on floors 92-98 and was headed to the 96th floor to begin my assigned work for the day when my co-worker informed me there was no need to go to that floor. So instead, I proceeded to the 43rd floor where my mother and stepfather were in the cafeteria.

As I exited the elevator, the first plane hit the building, causing an explosion from the shaft that blasted me forward about 10-15 feet and causing the ceiling to collapse on top of me and my friend, Arturo. In that moment, I believed we had both died.

6. When I regained my strength after the ceiling collapsed, I struggled to find my mother so that we could both escape. Once I found her, I grabbed her by the arm and ran toward a stairway where we miraculously found my stepfather who was limping as a result of burns he had suffered to both of his legs. The three of us ran down the nearest stairway until we were trapped by the flames and could not go any further. We ran back up the stairs to a higher floor to try escaping down a different stairwell.

7. When we found the other stairwell, my stepfather and I had to force door open using all of our remaining strength because it was jammed during the collapse. I watched as firefighters and other first responders climbed up the stairs carrying all of their gear while I ran toward safety with other civilians. I will never forget the concern on their faces as they ascended towards imminent death.

8. We finally exited the stairwell into the flooded lobby where everything that was once familiar was destroyed. We were finally able to escape the building about 45 minutes after the first plane hit.

9. We exited the North Tower and I heard a loud “thump,” followed by several other “thumps.” I turned to see that the sounds were human bodies hitting the ground. I can still recall that one woman’s foot was completely severed from her lifeless body, and yet her shoe was still intact. I instructed my mother not to look at the decimated bodies on the sidewalk, but those images are forever engraved in our minds.

10. Throughout our escape, I unsuccessfully tried to call my brother and continued to worry that he had not survived the attacks. I was prepared to re-enter the building to rescue him once I got my mother out safely, and was walking toward the South Tower when I saw one of his close friends and co-worker who told me he had escaped.

11. Seconds later, I looked up at the South Tower and noticed it was about to collapse. I grabbed my mother and stepfather and we ran as our bodies were pelted by the debris. We made it about a block before we were unable to breathe and the smoke and dust were too dense to open our eyes. I heard a voice calling for other survivors as we stumbled through the darkness. We finally came upon a faint light and revolving doors of a Duane Reade store where injured first responders were lying on the ground. Seeing those who were supposed to rescue others lying there helplessly confirmed that the devastation was beyond my original understanding.

12. I helped my mother clean her face with a bottle of iced tea, as that was all I could find, and helped a man clean up his bloody injury. Assuming there were more attacks to follow, we waited in the store as the second building fell and coated us once again in darkness and silence.

13. After approximately 30 minutes, we left the store, using t-shirts as makeshift facemasks, and walked through the dust and clouds of smoke toward the Brooklyn Bridge. As soon as we reached an ambulance, my body gave way to the physical injuries I sustained during the escape and I fell to the ground.

14. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: injuries to my head, neck, back, and leg, third-degree burns, six herniated discs, GERD, heartburn, PTSD, anxiety, and severe smoke inhalation.


15. Additionally, several of my close friends and co-workers lost their lives to the terrorist attacks. One of my close friends and co-workers had actually reported to the 98th floor that morning, and did not survive the horrific attacks. I witnessed my mother and stepfather suffer serious injuries and was left to wonder whether my younger brother had survived the attacks or not. As a result, I suffered and continue to suffer from severe emotional distress and bouts of depression due to the traumatic events of these terrorist attacks. I suffered and continue to suffer from lack of sleep and loss of enjoyment as a result of the traumatic events I experienced.

16. I sought medical attention for my injuries. I was transported to Brooklyn Hospital the day of the attack and received treatment related to the injuries I sustained that day through the World Trade Center Health Program. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

17. I previously pursued a claim (Claim Number Unknown) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 10 day of January 2020.



Antonio Quinones

Exhibits Filed Under Seal